

1 [Stipulating parties listed on signature page]  
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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 INTRI-PLEX TECHNOLOGIES, INC.,

14 Case No. 3:17-cv-01097-EMC

15 Plaintiff,

16 v.

17 NHK INTERNATIONAL CORPORATION;  
18 NHK SPRING CO., LTD.; OGAKI SEIKO CO.,  
19 LTD.; AND SEIKO HIGH TEC CORP.

20 Defendants.

21 **STIPULATION AND [CORRECTED]  
22 [PROPOSED] ORDER REGARDING  
23 INITIAL DISCLOSURES**

24 WHEREAS, Plaintiff Intri-Plex Technologies, Inc. (“Plaintiff”) filed its complaint on  
25 March 3, 2017 naming as Defendants NHK International Corporation (“NHK International”),  
26 NHK Spring Co., LTD. (“NHK Spring”), Ogaki Seiko Co., LTD. (“Ogaki Seiko”) and Seiko  
High Tec Corp. (“Seiko High Tec”) (collectively, the “Defendants”) (D.I. 1);

WHEREAS, on March 6, 2017, the Court issued an Order Setting Initial Case  
Management Conference and ADR Deadlines (D.I. 7) setting May 10, 2017 as the deadline to  
hold a Rule 26(f) conference, May 24, 2017 as the deadline for the Initial Disclosures and the  
Joint Case Management Statement, and May 31, 2017 for the Initial Case Management  
Conference;

WHEREAS, on March 27, 2017, the Court issued an Order Regarding Service of Process  
(D.I. 20) moving the time to answer the complaint to June 7, 2017;

WHEREAS, the Defendants have not yet filed an answer to the complaint;

1 WHEREAS, on May 10, 2017, the parties held their Rule 26(f) conference;

2 WHEREAS, on May 11, 2017, the Court issued an Order Reassigning Case (D.I. 29)  
3 reassigning this case to the Honorable Judge Edward M. Chen and vacating the previously-  
4 scheduled Initial Case Management Conference;

5 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties  
6 that:

7 1. Notwithstanding the times set forth in the Order Setting Initial Case Management  
8 Conference and ADR Deadlines (D.I. 7), the deadline for the Initial Disclosures shall be June 7,  
9 2017; and

10 2. No other dates or deadlines shall be modified by this stipulation and order.

11 DATED: May 25, 2017

SIMPSON THACHER & BARTLETT LLP

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13 By: /s/ Jeffrey E. Ostrow

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21 *Attorneys for Plaintiff Intri-Plex  
Technologies, Inc.*

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23 DATED: May 25, 2017

24 FORAN GLENNON PALANDECH  
PONZI & RUDLOFF PC

25 By: /s/ Marjie D. Barrows

26  
27 Marjie D. Barrows  
28 *Attorneys for Defendants NHK International  
Corporation; NHK Spring Co., Ltd.; Ogaki  
Seiko Co., Ltd.; Seiko High Tec Corp.*

## ATTESTATION OF CONCURRENCE IN FILING

Pursuant to the Northern District of California's Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: May 25, 2017

## SIMPSON THACHER & BARTLETT LLP

By: /s/ Jeffrey E. Ostrow

Jeffrey E. Ostrow

*Attorney for Plaintiff Intri-Plex  
Technologies, Inc.*

1  
2 [PROPOSED] ORDER  
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4 Pursuant to foregoing stipulation, IT IS SO ORDERED that the deadline for the Initial  
5 Disclosures shall be June 7, 2017.  
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7 Dated: 5/26, 2017  
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